

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

C.J., a minor, by and through her)	
next friend and guardian, BETTY)	
JEAN MURPHY JAMES,)	
)	
and)	
)	
BETTY JEAN MURPHY JAMES,)	
as Administrator of the Estate of)	
Latoya James)	
)	
Plaintiffs,)	CIVIL ACTION
)	FILE NO.: 2:22-CV-00078-LGW-BWC
v.)	
)	
MICHAEL BLAQUIERE, in his)	
individual capacity, as Camden County)	
Deputy Sheriff)	
)	
and)	
)	
DOWNY CASEY, in his individual)	
capacity, as a Camden County Deputy)	
Sheriff)	
)	
and)	
)	
JOHN/JANE DOES, in their individual)	
capacities, as Camden County Deputies)	
)	
)	
)	
Defendants.)	
)	

STATUS REPORT

With the discovery period having now concluded in the above captioned case, the Parties make the following report to the Court.

I. DISCOVERY

A. Is all discovery completed in this case?

Yes No

- If “No”, please list what discovery is remaining:

**DEFENDANTS’ EXPERT REPORT(S) AND DEPOSITION OF
DEFENDANTS’ EXPERT(S)**

B. Are there any discovery issues which have been or will be brought before the Court for resolution?

Yes No

- If “Yes”, please briefly explain:

Click here to enter text.

II. SETTLEMENT

A. Have the parties made efforts to resolve this case?

Yes No

- If “Yes”, please explain those efforts:

Click here to enter text.

B. Are the parties prepared to discuss settlement of this case with the Court at this time?

Yes No

- If “No”, please explain:

The parties are having initial discussions about whether it is appropriate to mediate prior to dispositive motions.

C. Are there any third parties and/or lien holders that should be included in any settlement discussions for this case?

Yes No

- If “Yes”, please list those parties:

Click here to enter text.

D. The Parties propose the following agreed upon dates, prior to the deadline for filing motions, for conducting a status conference. (*Please provide several dates for the Court’s consideration in scheduling. Regardless of whether the Parties seek to discuss settlement, the Court may require that each party have a representative with full settlement authority present.*)

The parties will make themselves available at the Court’s convenience.

III. MOTIONS

A. The Plaintiff(s) anticipate filing the following Motions:

- None
- Motion for Summary Judgment
- Motion to Exclude Expert Testimony
- Other Motion(s) (Except for Motions in Limine), please explain:

Depending on expert report to be received on October 16, 2023, Plaintiff may seek to exclude expert testimony

B. The Defendant(s) anticipate filing the following Motions:

- None
- Motion for Summary Judgment
- Motion to Exclude Expert Testimony
- Other Motion(s) (Except for Motions in Limine), please explain:

Click here to enter text.

IV. ADDITIONAL MATTERS

If there are any other matters regarding this case that the Parties seek to bring to the Court's attention at this time, please briefly explain:

Due to a delay in receipt of a deposition transcript, the parties agreed that Defendants' expert report(s) would be provided on October 16, 2023 and said expert(s) will be deposed on November 1, 2023. Further, Defendants wish to take the Deposition of Varshon Brown, but his counsel has indicated that he will assert Fifth Amendment privilege as to all pertinent issues. Should the privilege no longer attach, Defendants will seek to take Mr. Brown's deposition.

Dated: October 13, 2023

s/Mario A. Pacella

Counsel for Plaintiff(s)

s/Wesley C. Jackson

Counsel for Defendant(s)